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OF TRUSTEES OF THE LELAND
STANFORD JUNIOR UNIVERSITY

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

JANE DOE,

Plaintiff,

v.

STANFORD UNIVERSITY,

Defendant.

Civil Action No. 3:16-cv-06973-EJD

**DEFENDANT'S STATEMENT OF
NON-OPPOSITION**

Date: March 16, 2017

Time: 9:00 a.m.

Dept: Courtroom 4, 5th Floor

Judge: Hon. Edward J. Davila

Defendant THE BOARD OF TRUSTEES OF THE LELAND STANFORD JUNIOR
UNIVERSITY ("Stanford") hereby submits its Statement of Non-Opposition to the Motion for
Leave To Proceed Using Pseudonym filed by Plaintiff Jane Doe ("Plaintiff") on December 15,
2016 (the "Motion").

The true identity of Plaintiff is known to Stanford. In footnote 2 of the Motion Plaintiff
states that her private educational records are subject to the provisions of the Family Educational
Rights and Privacy Act ("FERPA"), 20 U.S.C. § 1232g, 34 C.F.R. § 99.3. However, because
Plaintiff has initiated litigation against Stanford and included allegations in her Complaint

1 regarding her own educational records, Stanford is permitted to disclose Plaintiff's records
2 relevant to Stanford's defense of this matter. 34 C.F.R. § 99.31(a)(9)(iii).

3 Stanford does not agree with Plaintiff's allegations in support of her claims, repeated in
4 the Motion (and Stanford's position on them is set forth in its Answer to the Complaint).
5 Regardless of its disagreement with Plaintiff's allegations, however, Stanford respects the
6 privacy interests of its students and does not wish to subject them to unnecessary public
7 disclosures with respect to this lawsuit. For that reason, Stanford agreed not to oppose Plaintiff's
8 request to proceed in the lawsuit using a pseudonym on the conditions that Plaintiff will not
9 make any public statements under either her real name or pseudonym during the pendency of the
10 matter and that all Stanford students or former students will be similarly identified by
11 pseudonym in any public filings. Plaintiff, through her counsel, agreed to those conditions, and
12 that agreement is confirmed in footnote 1 of the Motion. Declaration of Sarah G. Flanagan in
13 Support of Defendant's Statement of Non-Opposition, ¶ 3.

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16 Dated: December 29, 2016

PILLSBURY WINTHROP SHAW
PITTMAN LLP

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18 By: /s/ Sarah G. Flanagan
Sarah G. Flanagan

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20 Attorneys for Defendant THE BOARD OF
21 TRUSTEES OF THE LELAND
STANFORD JUNIOR UNIVERSITY
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